

March 29, 2019

Notice of Ex Parte

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: Advanced Methods to Target and Eliminate Unlawful Robocalls, CG Dkt. 17-59

Dear Ms. Dortch:

This is to inform you that on March 27, 2019, Chris Drake and the undersigned, representing iconectiv, met with the following individuals in connection with the above-referenced proceeding: Zenji Nakazawa, Legal Advisor to Chairman Pai; Eric Burger, Chief Technology Officer; Josh Zeldis and Kristi Thornton from the Consumer and Governmental Affairs Bureau; and Bill Andrie from the Wireline Competition Bureau.

iconectiv reiterated many of the points made in its *ex parte* letter dated December 6, 2018, in which we described the operational and design differences between the proposed database for reassigned numbers and the functions of the NANPA and Pooling Administration (NANPA/PA) databases. We explained that, as a result of these differences, requiring that the reassigned numbers database be acquired from the same entity that secures the long-term NANPA-PA Administrator contract will limit the number of potential companies interested in bidding on these contracts, with the likely result being increased costs to the Commission and the industry. We also explained that utilizing the Billing & Collection agent as a vehicle to pay for the development of the reassigned numbers database unnecessarily placed the risk of the effort on the carriers, when there are vendors willing to assume these up-front costs (as is typical in such an acquisition). Additionally, we pointed out that tying the acquisition of reassigned numbers database to the NANPA/PA will almost certainly cause a significant detrimental delay to the process for acquiring a vendor for the long-term, combined NANPA/PA.

We concluded by noting that the Order directed the North American Numbering Council to provide recommendations back to the Commission on “the most cost-effective way of administering the database, with the goal of minimizing costs and burdens for all users and service providers, while ensuring that it will fully serve the intended purpose,” and urged the Commission to take appropriate steps to ensure that the NANC has the flexibility to recommend an approach that it deems best satisfies these goals.

If you have any questions concerning this notice, please contact me at 202-579-4205.

Sincerely,

Glenn T. Reynolds
Head of Government and Industry Affairs
iconectiv

cc: Zenji Nakazawa
Eric Burger
Josh Zeldis
Bill Andrie
Kristi Thornton